

1 W. West Allen, Esq.
Nevada Bar No. 5566
2 Jonathan W. Fountain, Esq.
Nevada Bar No. 10351
3 HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes Pkwy., Suite 1000
4 Las Vegas, NV 89169
Tel. (702) 257-1483
5 Email: wwa@h2law.com
Email: jwf@h2law.com

6 Eleanor M. Yost, Esq.
7 Mac R. McCoy, Esq.
CARLTON FIELDS
8 4221 W. Boy Scout Blvd., Suite 1000
Tampa, FL 33607
9 Tel. (813) 229-4395
Email: eyost@carltonfields.com
10 Email: mmccoy@carltonfields.com

11 Joan K. Archer, Esq.
CARLTON FIELDS
12 2029 Century Park East, Suite 1200
Los Angeles, CA 90067
13 Tel. (310) 843-6367
Email: jarcher@carltonfields.com

14 Morgan A. Klein, Esq.
15 CARLTON FIELDS
Chrysler Building
16 405 Lexington Avenue, 36th Floor
New York, New York 10174
17 Tel. (212) 785-2577
Email: mklein@carltonfields.com

18 *Attorneys for Defendant*
19 *Foundation Partners Group, LLC*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 AFTER SERVICES, INC., a Delaware
corporation,

23 Plaintiff,
24 vs.

25 FOUNDATION PARTNERS GROUP, LLC,
a Florida limited liability company, and
26 DOES I-X, inclusive,

27 Defendants.
28

Case No. 2:24-cv-01207-JCM-BNW

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE
JANUARY 13, 2025, DISCOVERY
CONFERENCE**

1 Plaintiff After Services, Inc. (“Plaintiff”) and Defendant Foundation Partners Group, LLC
2 (“Defendant”), by and through their respective counsel, hereby agree and stipulate as follows:

3 1. This is a trademark dispute being litigated on an expedited basis, where the parties
4 have agreed to forego dispositive motions, with trial anticipated to occur in the late Summer of
5 this year.

6 2. In light of the expedited nature of this action, and in anticipation of the need to
7 resolve discovery disputes as efficiently as possible, the parties’ Discovery Plan and Scheduling
8 Order states the following: “The parties agree, pursuant to LR 26-1(c), that, before moving for an
9 order relating to discovery, the movant shall request a conference with the assigned magistrate
10 judge.” (ECF No. 31 at 4, ll. 19-21.)

11 3. The parties have been diligently engaged in serving and responding to written
12 discovery requests, on an expedited basis, including interrogatories, requests for the production
13 of documents, and requests for admissions. However, the parties have each identified several
14 disputes and areas of disagreement regarding their respective discovery responses and document
15 productions.

16 4. On December 19, 2024, the Court entered a Minute Order setting an in-person
17 Discovery Conference to occur on January 13, 2025, at 10:00 a.m. Since that time, the parties
18 have engaged in multiple meet-and-confer sessions, with some success, and have continued to
19 work on resolving the discovery issues that remain outstanding.

20 5. In light of the parties’ ongoing efforts to resolve their discovery disputes without
21 court intervention, the parties now seek and agree to adjourn the January 13, 2025, Discovery
22 Conference and request that the Court enter an order setting a follow-up Discovery Conference to
23 occur via videoconference on January 28, 2025, or as soon thereafter as the Court’s schedule
24 permits.

25 **IT IS SO AGREED AND STIPULATED:**

26 By: /s/ Jonathan W. Fountain
Jonathan W. Fountain, Esq.
27 Nevada Bar No. 10351
HOWARD & HOWARD ATTORNEYS, PLLC
28 3800 Howard Hughes Pkwy, Suite 1000

By: /s/ F. Christopher Austin
F. Christopher Austin, Esq.
Nevada Bar No. 6659
WEIDE & MILLER, LTD.
10655 Park Run Drive, Suite 100

1 Las Vegas, NV 89169
2 Tel. (702) 257-1483
3 Email: jwf@h2law.com

4 Eleanor M. Yost, Esq.
5 Mac R. McCoy, Esq.
6 CARLTON FIELDS
7 4221 W. Boy Scout Blvd., Suite 1000
8 Tampa, FL 33607
9 Tel. (813) 229-4395
10 Email: eyost@carltonfields.com
11 Email: mmccoy@carltonfields.com

12 Joan K. Archer, Esq.
13 CARLTON FIELDS
14 2029 Century Park East, Suite 1200
15 Los Angeles, CA 90067
16 Tel. (310) 843-6367
17 Email: jarcher@carltonfields.com

18 Morgan A. Klein, Esq.
19 CARLTON FIELDS
20 Chrysler Building
21 405 Lexington Avenue, 36th Floor
22 New York, New York 10174
23 Tel. (212) 785-2577
24 Email: mklein@carltonfields.com

25 *Attorneys for Defendant*
26 *Foundation Partners Group, LLC*

Las Vegas, NV 89144
Tel. (702) 382-4804
Email: caustin@weidemiller.com

Samuel Castor, Esq.
Nevada Bar No. 11532
Erven T. Nelson, Esq.
Nevada Bar No. 2332
Scott Whitworth, Esq.
Nevada Bar No. 15671
LEX TECNICA, LTD.
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Tel. (725) 239-8413
Email: sam@lextecnica.com
Email: erv@lextecnica.com
Email: scott@lextecnica.com

Attorneys for Plaintiff
After Services, Inc.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 1/13/2025